



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COOKEVILLE ENVIRONMENTAL FIELD OFFICE
DIVISION OF WATER POLLUTION CONTROL
1221 SOUTH WILLOW AVENUE
COOKEVILLE, TN 38506
PHONE 931-432-4015 STATEWIDE 1-888-891-8332 FAX 931-432-6952**

August 19, 2010

Certified Mail
91 7108 2133 3937 2540 4967

Bon De Croft Utility District
Mr. Danny Brock, General Manager
9100 Crossville Hwy
Sparta, Tennessee 38583

**RE: Compliance Evaluation Inspection / Notice of Violation
Water Source: Billy's Branch Lake (Sky Lake) – Bon De Croft Utility District,
Receiving Stream: un-named tributary to Lost Creek, NPDES # TN0077968,
White County. Permit Expiration: September 27th, 2009**

Dear Mr. Brock:

On August 3rd, 2010, the Division of Water Pollution Control (WPC) conducted a Compliance Evaluation Inspection (CEI) at the Bon De Croft Utility District's water supply lake, Billy's Branch Lake (Sky Lake). The purpose of the CEI was to determine compliance and review the discharge from the backwash filter operation. This letter serves as a Compliance Evaluation Inspection and Notice of Violation report. The discharge is ultimately to Lost Creek. Plant Operators were met at the site during the plant inspection.

Permit, Records, and Self-Monitoring Data

The Bon De Croft Utility District, (BDCUD), backwash water treatment facility is operating under an expired permit issued on September 29th, 2004. The new permit is currently in process. The utility sends its Discharge Monitoring Reports to the Nashville Central Office within the specified time period. The Utility voluntarily sends additional reports to the Cookeville Environmental Field Office.

Water Treatment Plant and Laboratory

The water treatment plant was reviewed and found to be clean and well kept. The treatment system related to regulation by the Division of Water Pollution Control consists of a single sedimentation basin. It is possible that this basin is no longer large enough to effectively settle the back wash cycles from the recently refurbished water plant. The pipe configuration within the basin should be reviewed in order to consider if additional detention time could be added.

The outlet valve on the sediment basin was in need of repair. The operational handle was broken and the valve was stuck in the open position. The discharge was objectionable resulting in a visible plume within the receiving stream, (see the attached photos). This is a violation of the Tennessee Water Quality Control Act.

The *State of Tennessee Clean Water Act of 1977*, T.C.A. 69-3-101 et seq. Specifically § 69-3-114 (a) which states:

It shall be unlawful for any person to discharge any substance into waters of the state or to place or cause any substance to be placed in any location where such substances, either by themselves or in combination with others, cause any of the damages as defined in § 69-3-103 (22), unless such discharge shall be due to an unavoidable accident or unless such action has been properly authorized. Any such action is declared to be a public nuisance.

Laboratory

The lab was neat well organized and clean. The aluminum test being performed on site does not meet the test method requirement. Aluminum testing will need to be performed by your contract laboratory. The wastewater chlorine test is to be performed as Total Residual Chlorine. As discussed, please review the equation for calculating and reporting Total Suspended Solids, (TSS). The TSS result will quickly demonstrate the efficiency of the settling basin.

Flow Measurement

The operator measures the flow using backwash flow pump rates. Flow proportional sampling is not required. Backwash cycles are now more frequent with smaller volumes per cycle.

Complaints

The Division (TDEC, WPC) is not aware of any complaints.

Required Action

1. As discussed, immediately repair the effluent valve on the settling basin. Eliminate the objectionable discharge entering the receiving stream.
2. Utilize the correct math formula for calculating the Total Suspended Solids.
3. The aluminum test will now meet the standard method requirements for wastewater.
4. Total Residual Chlorine will be utilized as the test parameter for the wastewater discharge.

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Please respond in writing to this CEI / NOV report. Within this written response include documentation regarding the resolution of the previous four required actions. Please submit this written response by September 3rd, 2010.

The State of Tennessee Inspectors will continue to monitor the treatment works in order to ensure compliance with the State's Water Quality Control Act.

This letter shall serve as a **Notice of Violation** and in keeping with standard procedure, will by copy, notify the Division of Water Pollution Control's Enforcement and Compliance section. Violations of the Tennessee Water Quality Control Act and its related permits may subject you to civil penalties.

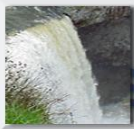
If you have any questions, you may contact me in Cookeville via telephone at (931) 432-7635 or toll free at 1-(888)-891-8332. You may also use electronic mail at: Oakley.Hall@tn.gov.

Sincerely,

Wm. Oakley Hall
Division of Water Pollution Control
Cookeville Environmental Assistance Center

Enclosures: EPA 3560 Form; Site Photos

cc: Cookeville EFO file; TN0077968; White County
Patrick Parker, WPC, Central Office - Enforcement & Compliance
Rob Howard, WPC Field Office Manager, Cookeville
Johnny Walker, DWS Field Office Manager



Tennessee Department of Environment
and Conservation
Division of

Water Pollution Control

**Bon De Croft Utility District
Water Treatment Plant
Photo Records
White County**

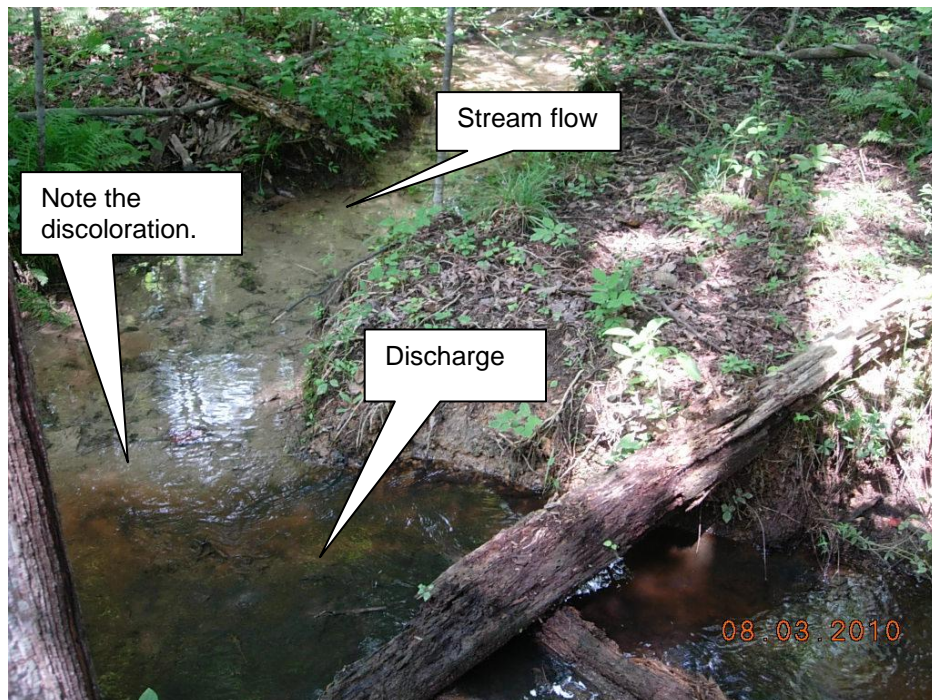


Photo by Oakley Hall; 8-3-10, Discharge to the receiving stream is objectionable.



Photo by Oakley Hall; 8-3-10; The settling basin may need to be enlarged.
The effluent valve is in need of repair.